

Select Committee on Equal Protection and DEI

Results on Actions Taken on Kehoe's DEI Executive Order

Department of Conservation Response

Missouri Department of Conservation Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Estimated Cost Savings from Response	Other Notes (if any)
Other	MDC's Inclusion and Diversity Working Group was initiated in September 2020 and deactivated in February 2025. The Working Group was designed to ensure MDC employees understood the value brought by employees regardless of their protected class as defined by state and federal law. The Working Group also focused on urban/suburban/rural considerations related to stakeholder involvement. No changes to policy or procedure were enacted due to the Working Group. The Working Group did not advocate for special or different treatment of employees. The Working Group did not manipulate or influence the composition of the organization. The I&D Working Group was deactivated as part of a larger effort to streamline MDC working groups and to align the remaining working groups with the Director's intent. Although the I&D Working Group does not appear to conflict with EO 25-18's provisions, it is included here in an effort to clarify initiatives that could be deemed in conflict with the EO.	No	Deactivated	Activated September 2020. Deactivated February 2025.	Indirect cost savings due to resource allocation. Staff time expended on the Working Group (i.e., meetings, etc.) is now directed toward other work activities.	

MIKE KEHOE
GOVERNOR



TRISH VINCENT
DIRECTOR OF REVENUE

MISSOURI DEPARTMENT OF REVENUE
POST OFFICE BOX 311
JEFFERSON CITY, MISSOURI 65105-0311
PHONE: (573) 751-4450
FAX: (573) 751-7150
WEBSITE: www.dor.mo.gov

July 28, 2025

The Honorable Mike Moon
State Capitol, Room 220
Jefferson City, MO 65101

Re: Documentation demonstrating compliance with Executive Order 25-18

Dear Senator Moon:

This letter is in response to your request dated July 22, 2025, requesting information on compliance with Executive Order (EO) 25-18 issued by Governor Kehoe on February 18, 2025.

The Department of Revenue (DOR) upon receipt of the EO immediately reviewed our administrative policies that DOR employees follow for employment. All references to "genetic information" were immediately removed. Attached are all the policies that were updated.

We also reviewed classes that were provided by the Office of Administration which were contained on our DOR intranet MO Learning class selections. Attached is the list of classes that were removed from our intranet:

- Managing a Diverse Team
- Diversity, Inclusion, and Belonging
- Be an Inclusive Organization People Won't Leave
- Adding Value Through Diversity
- Managing a Diverse Team (2023)



If there is any additional information the committee requires, please let me know.

Sincerely,

A handwritten signature in black ink, reading "Trish Vincent". The signature is fluid and cursive, with the first name "Trish" and last name "Vincent" clearly distinguishable.

Trish Vincent
Director of Revenue

enclosures

cc: Senator Rick Brattin, Vice-Chair
Senator Karla May
Senator Joe Nicola
Senator Barbara Washington
Senator Cindy O'Laughlin
Senator Tony Luetkemeyer



Missouri Department of Revenue
ADMINISTRATIVE POLICY

ISSUED: July 1, 1976
APPROVED: February 27, 2025
AUTHORIZED BY: Trish Vincent
PAGE 1 OF 1

TITLE: Fair Employment Practices

Trish Vincent

REFERENCES: APM 2.06; Form I-9

PURPOSE

This policy establishes fair employment practices guidelines.

POLICY

1. The Department of Revenue is an equal opportunity employer. The goal of the Department is to attract, retain, and promote qualified team members. Employment decisions, including those related to recruitment advertising, recruitment, compensation, training, promotion, or termination of employment, shall be made on the basis of valid, and job-related criteria.
2. The Department shall not unlawfully discriminate against any team member or applicant for employment on the basis of age, race, color, national origin, sex, religion, veterans' status, disability, or any other reason prohibited by law. Discrimination will not be tolerated. Team members who violate this policy will be subject to disciplinary action, up to and including immediate termination of employment, as outlined in Administrative Policy 2.06, Discipline Procedures. Any perceived violation of this policy should be reported to the Human Relations Officer immediately.
3. The Department shall not unlawfully discriminate against any work-authorized individual based on citizenship status, immigration status, or national origin. The Department must document verification of the identity and employment authorization of each new team member hired after November 6, 1986, in compliance with the Immigration and Nationality Act.

New team members shall complete the Employment Verification Eligibility Form I-9 on his or her date of hire and supply acceptable identification to prove identity and employment authorization. Team members who do not provide acceptable identification evidencing identity and employment authorization within three business days from the date of hire will be subject to immediate termination, as outlined in Administrative Policy 2.06, Discipline Procedures.



Missouri Department of Revenue
ADMINISTRATIVE POLICY

ISSUED: July 1, 1976
APPROVED: February 27, 2025
AUTHORIZED BY: Trish Vincent
PAGE 1 OF 3

TITLE: Selection Procedures

Trish Vincent

REFERENCES: APM 2.02; MoCareers; RSMo 105.262; Form I-9; RSMo 43.540; E-Verify Process

PURPOSE

The Department of Revenue (Department) seeks to recruit and promote qualified team members. This policy establishes guidelines for advertising and filling job openings within the Department.

POLICY

1. The Department shall not discriminate against any team member or candidate for employment because of age, race, color, national origin, sex, religion, veterans' status, disability, or any other reason prohibited by law, as referenced in Administrative Policy 2.02, Fair Employment Practices.
2. Job Openings
 - A. Posting
 - 1) When an opening becomes available, the bureau should obtain the Division Director's approval to fill the position. After receiving approval, the bureau shall complete the Request to Fill (RTF) in HireTrue (or approved software) to request that the Human Resources and Total Rewards (HRTR) post the vacant position.
 - 2) HRTR will advertise vacant positions online at <https://mocareers.mo.gov/>. At the option of the division, job openings may also be advertised in commercial media or other approved web-based sites. Openings should be posted for a minimum of five working days.
 - B. Application
 - 1) Individuals (including current Department team members) seeking a position within the Department must submit an application for employment at <https://mocareers.mo.gov/> and, thereafter, select the vacant positions for which he or she wants to be considered.
 - 2) The division may also solicit and receive resumes directly. The division should forward all original resumes received to HRTR for retention. Such individuals should also apply at <https://mocareers.mo.gov/>.
 - 3) The hiring area will monitor applications submitted through HireTrue (or approved software) and update each applicant's status accordingly, hold interviews, complete reference checks, and select a candidate for hire.

C. Selection

- 1) Once a candidate is chosen, the hiring area will complete the Request to Hire (RTH) in HireTrue (or approved software) and submit for approval.
- 2) Upon notification of approval, a conditional offer of employment is made to the candidate. If the candidate accepts the offer, the hiring area will send the DOR-Conditional Offer email to the candidate through HireTrue (or approved software).
- 3) If the person selected is not already a team member of the Department or is taking a position in a different division, HRTR will complete a background check before approving that an offer of employment be made.

The background check consists of a review of state employment history, tax payment and filing requirements (business and personal), verification of any monies owed for motor vehicle and driver license insufficient checks, and a criminal history check (name-and-fingerprint-based) with the Highway Patrol on the selected candidate.

- a. No person, including Office of Administration, Information Technology Services Division (OA-ITSD), may be hired or given system access who fails to successfully clear the background check.
 - b. To clear a criminal background check, the candidate must meet the criteria outlined in the Department's Criminal History Check Guidelines, which are maintained in HRTR. In addition, upon hire, the Department verifies the selected candidate's eligibility to legally work in the United States through completion of the Form I-9 and E-Verify process.
 - c. In accordance with §105.262 RSMo, candidates must file all required state tax returns and pay all taxes, fees, and other monies owed to the state in full or agree to enter into a payroll deduction payment agreement upon hiring, if one is available.
- 4) A scanned copy of all interview materials should be sent to HRTR for retention upon completion of the hiring process.
- D. Team members remain active in the Missouri and National Rap Back Program which allows qualified entities, as defined by Section 43.540 RSMo, to receive updated Missouri and National fingerprint based criminal arrest information for each team member, contractor, and sub-contractor requiring access to FTI.

3. Exceptions to Job Posting Requirements

- A. The positions listed below are not required to be posted, but may be posted at the discretion of the Director of Revenue or the division directors:
- 1) Appellate Counsel
 - 2) Associate Counsel
 - 3) Deputy Department Director

- 4) Designated Principal Assistant - Department
- 5) Designated Principal Assistant - Division
- 6) Division Director
- 7) Deputy Division Director
- 8) General Counsel
- 9) Deputy General Counsel
- 10) General Counsel - Division
- 11) Legal Counsel
- 12) Managing Counsel
- 13) Out-State Audit Personnel
- 14) Senior Counsel
- 15) Special Assistant - Office and Clerical
- 16) Special Assistant - Official and Administrative
- 17) Special Assistant - Professional

B. Direct promotion or transfer may be used for internal promotions and transfers of team members within a division without posting the position. Direct promotion or transfer may be used under the following guidelines:

- 1) Direct promotion or transfer is available only for team members who are presently employed in the division where the vacancy exists.
- 2) Only a team member who meets the minimum qualifications for the vacant position may be directly promoted or transferred.
- 3) If a division has a vacancy it would like to fill by direct promotion or transfer, the division should contact HRTR.
- 4) Any vacancy created by a direct promotion or transfer may also be filled by a direct promotion or transfer, without posting, until one of the below occurs:
 - a. The process fails to produce a suitable internal candidate.
 - b. The entry-level position is reached.

C. The Director of Revenue may waive the posting requirement for any position because of organizational changes, business needs, and for unusual or emergency situations.

4 Waiver of Clearances

In unusual or emergency situations, the Director of Revenue may temporarily waive the completion of background checks prior to hiring by notifying HRTR. However, these checks will be completed as soon as practicable after hiring and employment is contingent upon the successful completion of the background check.



Missouri Department of Revenue
ADMINISTRATIVE POLICY

ISSUED: October 10, 1985
APPROVED: February 28, 2025
AUTHORIZED BY: Trish Vincent
PAGE 1 OF 2

TITLE: Harassment, Discrimination, and Anti-Retaliation

Trish Vincent

REFERENCES: APM 2.06

PURPOSE

The Department of Revenue (Department) is committed to providing a work environment for team members that is free of any unlawful harassment or discrimination.

DEFINITIONS

1. Harassment - For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate, or coerce a team member, co-worker, or any person working for or on behalf of the Department. Verbal taunting that impairs a team member's ability to perform his or her job is included in the definition of harassment.
2. Sexual harassment - Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to or rejection of such conduct is used as the basis for employment decisions or such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.
3. Discrimination - It is a violation of the Department's policy to discriminate based on, in whole or in part, the person's race, color, national origin, age, religion, disability status, gender, sexual orientation, or marital status.
4. Retaliation - The Department policy encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of the Department to investigate reports promptly and thoroughly. The Department further prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

POLICY

1. Any team member of the Department who believes that he or she has encountered harassment or discrimination must report the incident(s) to management and to Human Resources and Total Rewards (HRTR).
2. If a supervisor or manager becomes aware that harassment or discrimination is occurring, either from personal observation or as a result of a team member's coming forward, the supervisor or manager should immediately report it to the HRTR.
3. HRTR will immediately undertake an investigation of any such report. The investigation will be conducted in a manner that is considerate of the interests of all parties involved. If necessary, team members may be temporarily reassigned or placed on administrative leave with pay to ensure the safety of team members.
4. The Department will act quickly and decisively to resolve any alleged harassment or discrimination and to take corrective action as necessary.

TITLE: Harassment, Discrimination, and Anti-Retaliation

PAGE 2 OF 2

5. Harassment or discrimination of Department team members in or about the workplace by fellow team members, contractors, vendors, or members of the public will not be tolerated. Any team member who is found to have violated this policy is subject to disciplinary action, up to and including termination of employment, as outlined in Administrative Policy 2.06, Discipline Procedures.
6. Retaliation against those who report harassment or discrimination under this policy will not be tolerated. Any team member who takes retaliatory action against another team member as a result of a harassment or discrimination report is subject to disciplinary action, up to and including termination of employment, as outlined in Administrative Policy 2.06, Discipline Procedures.

Mike Kehoe
Governor

Trevor Foley
Director



2729 Plaza Drive
P. O. Box 236
Jefferson City, MO 65102
Telephone: 573-751-2389
Fax: 573-526-0880

State of Missouri
DEPARTMENT OF CORRECTIONS
"Improving Lives for Safer Communities"

July 23, 2025

Honorable Mike Moon
State Senator, District 29
State Capitol, Room 220
Jefferson City, MO 65101

Senator Moon,

This letter is in response to your July 22nd, 2025, letter requesting documentation, on behalf of the Select Committee on Equal Protection and DEI, demonstrating the department's compliance with Executive Order 25-18.

The department took no actions following the signing of Executive Order 25-18, as the department was already in compliance with the requirements of the order. The department had not added or altered any staff positions, added or altered any training requirements or materials, revised any policies, procedures, or practices, or made any budgetary changes inconsistent with the requirements of Executive Order 25-18 in the years prior to its signing. Therefore, I have no documentation of changes implemented to forward to the committee for review.

I would be happy to provide any documentation the committee requests related to our policies and procedures, training requirements, budgetary allocations, or workforce to demonstrate compliance, but none of those have been altered due to Executive Order 25-18. Please let me know if you or the committee would like this documentation reflecting no changes.

Sincerely,

A handwritten signature in cursive script, appearing to read "Trevor Foley", written in dark ink.

Trevor Foley
Director



105 West Capitol Avenue
P.O. Box 270
Jefferson City, Missouri 65102

Missouri Department of Transportation
Ed Hassinger, P.E., Director

1.888.ASK MODOT (275.6636)

July 24, 2025

The Honorable Mike Moon
Missouri Senate
State Capitol Office 220
Jefferson City, MO 65101

Dear Senator Moon:

Thank you for your request for materials demonstrating the Missouri Department of Transportation's efforts to comply with Executive Order 25-18. Enclosed with this letter, please find the information that was provided to the Governor's office reporting on the department's compliance. Upon your review, should you need additional information or have any questions, please let me know.

Sincerely,

Ed Hassinger, P.E.
Director

Enclosure

C: Lester Woods
Pamela Harlan
Terri Parker



Our mission is to provide a world-class transportation system that is safe, innovative, reliable and dedicated to a prosperous Missouri.

State Agency Response to EO 25-18					
Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Estimated Cost Savings from Response
					Other Notes (if any)
Contract	ModOT, Construction Workforce Program Job Special Provision (JSP) https://reg.mdot.mg/Forms/JSP/MS5137.docx Workforce Program This contract provision requires the contractor to make a good faith effort to meet workforce goals as established by the Office of Federal Contract Compliance Programs (OFCCP) on Federally assisted contracts.	Yes	ModOT is continuing to implement the program pursuant to 48 CFR 52.222-23 and 41 CFR 60-4.2	N/A	N/A
Program	External Workforce Affirmative Action OFCCP outlines the requirements in 48 CFR 52.222-23 and 41 CFR 60-4.2, where the goals are applicable per contractor, per geographic area. A contractor's success or failure in meeting the the workforce goals is intended as a benchmark for the company, showing them how effective their recruitment & hiring practices are and whether they need to increase those efforts.	Yes	This program is still applicable according to the following CFR's: 48 CFR 52.222-23 and 41 CFR 60-4.2. ModOT has not received guidance noting otherwise from the USDOJ or OFCCP. ModOT is continuing to include the required Notice in all Federal and sub contracts, as specified in the CFR's referenced.	N/A	N/A
Contract	Firm FHWA 1273 This form is included on all FHWA-assisted contracts and includes provisions describing: nondiscrimination, & non-segregated facilities.	Yes	ModOT has not received any guidance from FHWA on the status of the FHWA 1273 form. ModOT is continuing to include this on all FHWA-assisted contracts	N/A	N/A
Program	Contract Compliance Reviews On an annual basis, ModOT selects 10 - 12 contracts to conduct an EEO compliance review in accordance with Subpart D of 23 CFR 230 which describes the Construction Contract Equal Opportunity Compliance Procedures.	Yes	ModOT has not received any guidance from FHWA on the status of the contract compliance program. ModOT is continuing the administer the program as federally mandated	N/A	N/A
Program	Bulletin Board Checklist In accordance with FHWA 1273 contractors are required to post notices and posters setting forth the contractor's EEO Policy. In addition, the Missouri Department of Labor and Federal Department of Labor require the posters that relate to Discrimination in Public Accommodation, EEO is the Law, and the Federal Acquisition Regulation (FAR).	Yes	ModOT has not received any guidance from the Missouri Department of Labor or the Federal Department of Labor. ModOT is continuing to administer the compliance of this requirement.	N/A	N/A
Contract	DOT Training Special Provision ModOT has an On-the-Job Training (OJT) provision for FHWA funded contracts. ModOT evaluates federally funded projects for an OJT goal, where the awarded contractor makes good faith efforts in training and upgrading a minority, female, or economically disadvantaged trainee or apprentice. This provision is outlined in Appendix B to Subpart A of 23 CFR Part 230.	Yes	ModOT has not received any guidance from FHWA on the status of the OJT program. ModOT is continuing the administer the program as federally mandated.	N/A	N/A
Program	OJT Supportive Services ModOT receives an annual allocation of On-The-Job Training Supportive Services Funds from FHWA in accordance with 23 CFR 230.113	Yes	ModOT is currently administering OJT SS funds received from FHWA for FY2023. ModOT received the disbursement of funds for FY2024 and is currently soliciting bids to award the funding.	N/A	N/A
Program	DBE Supportive Services ModOT receives an annual allocation of DBE Supportive Services Funds from FHWA in accordance with Subpart B of 23 CFR 230.	Yes	ModOT is currently administering DBE SS funds received from FHWA for FY2023 and is awaiting the disbursement of funds for FY2024.	N/A	N/A

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Estimated Cost Savings from Response	Other Notes (if any)
Program	DBE Program MoDOT certifies firms as Disadvantaged Business Enterprises, evaluates federally assisted projects for a DBE goal, provides concurrence on DBE participation prior to award, monitors DBE participation throughout the contract, and evaluates final DBE participation at contract completion.	Yes	MoDOT has not received any guidance from FHWA on the status of the DBE program. MoDOT is continuing the administer the program as federally mandated.	N/A	N/A	
Program	Title VI MoDOT has oversight of its programs and services and to ensure these programs and services do not discriminate on the basis of race, color or national origin. MoDOT has a Title VI Plan, which is submitted annually to: FHWA & FMCSA and tri-annually to FTA.	Yes	MoDOT has not received any guidance from any USDOT Operating Administration on the status of Title VI. MoDOT is continuing to administer the Title VI program as federally mandated by Title VI of the Civil Rights Act of 1965.	N/A	N/A	
Program	ADA MoDOT has oversight of its programs and services and to ensure these programs and services do not discriminate on the basis of disability.	Yes	The U.S. Access Board published a final rule on the Public Right of Way Accessibility Guidelines (PROWAG) on August 8, 2023, which are yet to be adopted by USDOT & USDOJ. However, PROWAG guidelines from 2011 are still in effect and MoDOT is continuing to follow these guidelines. MoDOT will also continue to ensure nondiscrimination against people with disabilities in programs and services MoDOT provides, as federally mandated by Title II of the Americans with Disabilities Act of 1990.	N/A	N/A	

State Agency Response to EO 25-18						
Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Estimated Cost Savings from Response	Other Notes (if any)
Procedure	Our solicitation documents have a paragraph mirroring our procurement regulations (7 CSR 10-1.0209) stating the Division will encourage Minority and Women Business participation in procurement.	No	The Executive Order does not require a change. The rule has been promulgated following the process outlined in state statutes, so the rule has the force of law. The Executive Order specifically excludes DEI programs "authorized by state or federal law."			
Contract	Rest Area Management Service contract requires Sheltered Workshops to be subcontractors for janitorial services.	No	The Executive Order does not require a change. The Sheltered Workshops are defined as not for profits that employ only persons with disabilities. The executive order only applies to "race, color, ethnicity, gender identity, or sexual orientation" so any treatment based on disability would be outside the scope of the Executive Order.			

State Agency Response to EO 25-18						
Category of DEI Initiative (select from list)	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Brief Summary of DEI Initiative	Action Taken	Timelines	Estimated Cost Savings from Response	Other Notes (if any)
Contract	Yes	This is not a MoDOT or state of Missouri requirement, but rather certifications and assurances currently required by USDOT in all of our highway safety grant contracts refer to "Executive Order 13885, Advancing Racial Equity and Support for Underserved Communities through the Federal Government [advancing equity across the Federal Government]." NHTSA has indicated any DEI component of the certifications and assurances will no longer be enforced and that revised contract conditions will be prepared for FY26 contracts.	Current contracts (FY25) will remain as is as NHTSA has already indicated they will no longer enforce the requirement. For FY26, the contract language will be updated to reflect the changes.	FY26 contracts will be issued this fall with an effective date of 10/1/2025.	50	

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Estimated Cost Savings from Response	Other Notes (if any)
Training	The Equal Opportunity Refresher Training. This training is essential for maintaining our commitment to Equal Employment Opportunity (EEO) standards, as it is mandated every three years by law. Compliance with 1 CSR, specifically Section 20-6.010(8), requires that all supervisors, managers, and executives undergo training in diversity and the prevention of unlawful discrimination.	Yes	MoDOT has thoroughly reviewed this training and will continue its implementation to ensure compliance with the law 1 CSR, specifically Section 20-6.010(8) and 1 CSR 20-6.010 (2) (A) 3.	N/A		

Department of Public Safety Response

Department of Public Safety Response to EO 25-18

DPS Division	Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement	Action Taken	Timelines	Other Notes (if any)
Director's Office (Office of Homeland Security)	Program	FY25, HB 8, Sec. 8.006 appropriated \$150,000 for "a minority police officer recruitment and retention program to include mental health resources, located in a city not within a county with such program being administered and overseen by African-American police officer association that supports efforts in reducing crime in a city not in a county with more than one million inhabitants." FY26, HB 8, Sec. 8.006 appropriates \$500,000 with the same language.	No.	No action taken, as FY25 funds were already subawarded, and the FY26 appropriation language has yet to be signed by the Governor.	In progress	To avoid a potential violation of the Equal Protection Clause, the Governor could line item veto the "African American" language in FY26, HB 8, Sec. 8.006.
Director's Office	Policy	Diversity was previously listed as one of DPS-DO's core values listed on DPS's public-facing website, which was removed in February of 2025.	No	Resolved. Replaced the "Diversity" header on DPS's public facing website and the statement underneath it with: "Equality - We will uphold the constitutional principle of equal treatment under the law by ensuring fairness, equal opportunity, and merit-based decision-making."	Completed	
Director's Office (Office for Victims of Crime)	Program	The Formula Grants Program is authorized under the JJDP Act of 1974, to be eligible to receive a formula grant under JJDP's Title II, Part B Formula Grants Program Missouri must (1) develop a state plan to satisfy 33 statutory requirements, (2) designate a state agency to prepare and administer the state's plan, (3) establish a State Advisory Group to provide policy direction on the plan, and (4) committing to maintaining compliance with the four core requirements. DPS-DO administers Title II funds along with the Governor-appointed Missouri Juvenile Justice Advisory Group. The federal government establishes the requirements Missouri must meet in order to receive the funds and also sets forth what types of activities can receive funding, which historically has included DEI initiatives, which are specified in rows 6-8	Yes	No action taken.	In progress	Failure to comply with the federal grant requirements would result in a loss of federal funding (\$856,253 in FY22, \$888,418 in FY23, and \$876,418 in FY24) to local entities. However, the federal government is amending grant requirements and eligibility criteria to remove DEI requirements. 34 USC Secs. 11131-11133
Director's Office (Office for Victims of Crime)	Activity	To be eligible to receive Title II Formula Grants, DPS-DO maintains the state's R/ED plan (Racial and Ethnic Disparities), however, DPS-DO is not solely responsible for implementing the plan. The plan collects, maintains, and analyzes youth offender data to identify ways of reducing incarceration and recidivism among Missouri youth. Historically, members of particular racial and ethnic minorities are more impacted by incarceration, but the plan is ultimately aimed at reducing recidivism for all youth.	Yes	Resolved. Language emphasizing the remediation of racial and ethnic disparities has been removed from the DPS-DO website, but DPS-DO will continue to maintain and implement the plan in order to remain eligible for the federal grant money	In progress.	Failure to comply with the federal grant requirements would result in a loss of federal funding (\$856,253 in FY22, \$888,418 in FY23, and \$876,418 in FY24) to local entities. 34 USC Sec. 11133(a) sets forth the R/ED Plan requirement: "in order to receive formula grants under this part, a State shall submit a plan for carrying out its purposes applicable to a 3-year period."
Director's Office (Office for Victims of Crime)	Program	DPS-DO administers grant funds - as part of the R/ED plan - to local jurisdictions with awards that they may use for community-based, youth-serving agencies and organizations with strong collaborative relationships with their local juvenile justice systems. These include local governments, courts, public youth service organizations, school districts, private not-for-profit agencies with 501(c)(3) status, and faith-based organizations. Previously, federal requirements allowed subrecipients to use awarded funds "addressing racial disparities", which has been corrected.	No	Resolved. The federal government has already amended its requirements to eliminate much of the focus on particular racial and ethnic minorities.	Completed	Failure to comply with the federal grant requirements would result in a loss of federal funding (\$856,253 in FY22, \$888,418 in FY23, and \$876,418 in FY24) to local entities.

DPS Division	Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement	Action Taken	Timelines	Other Notes (if any)
Director's Office (Office for Victims of Crime)	Program	Gender-Specific Services - as part of the Title II requirements - DPS-DO has historically offered grant opportunities to localities for services aimed at reducing incarceration among girls, including pregnant teens, teen mothers, survivors of commercial sexual exploitation, domestic child sexual exploitation, girls with disabilities and racial and ethnic minority girls. While the programs are typically aimed at young girls, no one is excluded from the programs based on gender	Yes	Resolved. "Gender Specific Services" was removed from DPS's public facing website; although the funding opportunity was available in FY25, no gender-specific projects were funded through this award in FY25	Completed	
Director's Office (Office for Victims of Crime)	Program	DPS-DO administers the STOP (Services, Training, Officers, and Prosecutors) VAWA (Violence Against Women) Formula Grant Program. Funds are awarded to public and nonprofit agencies to enhance the capacity of local communities to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women and to develop and strengthen victim services in cases involving violent crimes against women. While grant funds are typically used for programs addressing violence towards women, no victim is excluded from services based on gender.	Yes	Resolved. DPS is ensuring its language clarifies that this funding is available to all, regardless of gender.	Completed	The total federal award amount for FY22 was \$2,560,930, FY23 was \$3,126,638, and FY24 was \$3,078,825. A portion of the funds supports DPS-DO's Office for Victims of Crime's program manager, program specialist, two grant officers, and an administrative/fiscal employee. The requirements for the STOP VAWA Formula Grant Program are established by
Missouri State Highway Patrol	Other	MSHP website stated, "The Missouri State Highway Patrol is committed to accreditation, core values, community policing, diversity, inclusion, service, and protection"	No	Resolved. Removed "diversity" and "inclusion" so the statement now reads: "The Missouri State Highway Patrol is committed to accreditation, core values, community policing, service, and protection."	Completed	
Missouri State Highway Patrol	Other	Intranet link to "OEO's Diversity and Culture Calendar"	No	Resolved. Link removed	Completed	
Missouri State Highway Patrol	Other	Intranet link to "OEO's Monthly Publications"	No	Resolved. Link removed	Completed	
Missouri State Highway Patrol	Other	Intranet "Diversity & Inclusion" training links (LinkedIn Learning)	No	Resolved. Link removed	Completed	
Missouri State Highway Patrol	Policy	MSHP Recruiting and Community Outreach Plan	No	Resolved. Language was amended to emphasize recruitment of qualified individuals; there is no language remaining indicating ties DEI	Completed	
Missouri State Highway Patrol	Policy	MSHP's General Order 31-01 included DEI language	No	Resolved. Language was amended to emphasize recruitment of qualified individuals; there is no language indicating ties to DEI	Completed	
Missouri State Highway Patrol	Organizational	Previously, there was a Human Resources position with the job title of "Human Resources Equity and Compliance Manager"	No	Resolved. "Equity" was removed from the job title to more closely mirror language encompassed in duties related to EEO and employment discrimination duties	Completed	
Alcohol & Tobacco Control	Policy	ATC's Vision Statement, as stated on agency website: "Maintain the Missouri Division of Alcohol and Tobacco Control as an organization of people who value one another, who embrace diversity and inclusion, and who treat each other and the public with dignity, and respect. Enforce the laws and regulations we are responsible for in a fair, equitable and professional manner, affording all an equal voice to be heard."	No	Resolved. Revised Vision Statement to omit the phrase "who embrace diversity and inclusion," as well as the term "equitable." The revised Statement will read "Maintain the Missouri Division of Alcohol and Tobacco Control as an organization of people who value one another, and who treat each other and the public with dignity, and respect. Enforce the laws and regulations we are responsible for in a fair and professional manner, affording all an equal voice to be heard."	Completed	

DPS Division	Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement	Action Taken	Timelines	Other Notes (if any)
State Emergency Management Agency	Practice	The Federal Emergency Management Agency (FEMA) placed a stop work order on the Community Assistance Program-State Support Services Element (CAP-SSSE) activities to remove the following terms from activity descriptions: Disadvantaged, Marginalized, Underserved, Low-Income, Environmental Justice, Climate, Equity, Inclusion, Diversity, Minority, Affirmative Action, Accessibility, Culture, Federal Flood Risk Management Standard (FFRMS) and Justice40. After receiving the stop work order from FEMA, SEMA's Floodplain Management Section stopped distributing the hardcopy books of its "After the Flood Quick Guide" because of its references to "disadvantaged" and "low-income" communities. The Floodplain Management Section removed extra copies of the "After the Flood Quick Guide" from the Floodplain Management	No	Resolved. This did not result in any programmatic changes, instead the "After the Flood Quick Guide" is no longer being distributed to NFIP-Participating communities after a flooding event and the electronic version is being removed from SEMA's website.	Completed	
State Emergency Management Agency	Program	The Chaplaincy Program is not a DEI initiative, but did contain DEI initiative language on its brochure at the time, taken from Equal Opportunity Affirmative Action materials, it has been removed from the brochure.	No	Resolved. The updated brochure has been placed on the SEMA webpage and does not contain affirmative action language.	Completed	
State Emergency Management Agency	Training	Under previous State Emergency Management Agency (SEMA) leadership, SEMA employees were required to take a Diversity Training and re-certify every two years. Diversity Training is no longer a requirement at SEMA and the Diversity training certificate link is no longer active.	No	Resolved. A ticket has been submitted to ITSD to remove the reference from SEMA page (https://sema.dps.mo.gov/training/index.php)	Completed	
State Emergency Management Agency	Activity	On the SEMA Floodplain Management Website, FEMA's Risk Rating 2.0: Equity in Action article was removed. Risk Rating 2.0: Equity in Action is a new pricing methodology for flood insurance within the National Flood Insurance Program (NFIP). It was not the rating methodology that was the problem, but rather the title of the article that included "Equity in Action."	No	Resolved. This did not result in programmatic changes. The Risk Rating 2.0: Equity in Action Document was removed from the website because of the title that contains "Equity."	Completed	
State Emergency Management Agency	Activity	The Floodplain Management Section is required by the CAP-SSSE grant to produce a quarterly floodplain management newsletter. On the SEMA Floodplain Management website, several recent editions are posted. The June 2024 edition of the Missouri Floodplain Management E-Bulletin was removed because it contained a page discussing the Federal Flood Risk Management Standard (FFRMS). Federal Executive Order 14030 was rescinded on January 20, 2025.	No	Resolved. This did not result in programmatic changes. The June 2024 Missouri Floodplain Management E-Bulletin was removed from the website because it referenced the revoked EO 14030.	Completed	
State Emergency Management Agency	Activity	Community Assistance Contact (CAC) visits are a process where the State Floodplain Management Section visits an NFIP-Participating community to evaluate their compliance with the National Flood Insurance Program (NFIP). Risk Rating 2.0: Equity in Action is a new pricing methodology for flood insurance within the National Flood Insurance Program (NFIP). The Floodplain Management Section removed FEMA's Risk Rating 2.0: Equity in Action informational document from the Community Assistance Contact (CAC) visits because it contains the verbiage "Equity in Action"	No	Resolved. This did not result in programmatic changes. The Risk Rating 2.0: Equity in Action Document was removed from the Community Assistance Contact visits because of the term Equity in the title.	Completed	

DPS Division	Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement	Action Taken	Timelines	Other Notes (if any)
Alcohol & Tobacco Control	Policy	ATC Policy A-1, "Purpose/Confidentiality of Manual", included the division's Vision Statement fully stated above.	No	Resolved. Amended policy to reflect revised Vision Statement wording as indicated above.	Completed	
Alcohol & Tobacco Control	Training	Quarterly DEI training courses assigned (appx. 1 hr each) from LinkedIn Learning	No	Resolved. Suspended quarterly training completion tracking for FY2025 Q3. No quarterly training assignment made for Q4 while program is under review.	Completed	
Missouri Capitol Police	Policy	MCP Policy 1109 Professional Development included verbiage on "Inclusion and Diversity"	No	Resolved. References removed.	Completed	
Missouri Capitol Police	Policy	MCP Policy 1000 Recruitment and Selection includes verbiage on racially and culturally diverse target markets.	No	None.	In progress	
Veterans Commission	Policy	The statement "At the Missouri Veterans Commission we value diversity because we believe in the power of our differences. MVC strives for an inclusive work environment where equal and equitable opportunities exist for all employees." is included on the MVC website, letterhead, internal policies and contracts.	Yes	None.	In progress	Per MVC, required by Title VII, Civil Rights Act of 1964, as amended.
Gaming Commission	Practice	MGC Vision Statement was "The Missouri Gaming Commission will be a diverse and inclusive organization respecting each other and the public while enforcing gaming laws and regulations in a fair, consistent and professional manner."	No	Resolved. Vision Statement revised to "The Missouri Gaming Commission will be a proactive and accountable organization while enforcing gaming laws and regulations in a fair, consistent and professional manner."	Completed	
Gaming Commission	Practice	MGC Core Values had a statement of "We demonstrate diversity and inclusion by treating everyone with respect and valuing our differences as we carry out our duties."	No	Resolved. Core Values revised to "We demonstrate dignity by treating everyone with respect and valuing our differences as we carry out our duties."	Completed	
Gaming Commission	Policy	MGC policy was titled "Affirmative Action, Selection, and Hiring". Policy also included a statement for recruitment that said "emphasis placed on individuals who are minorities, and/or members from a protected class."	No	Resolved. Policy renamed "Selection, Hiring, and Non-Discrimination in Employment." Policy revised to remove the emphasis on minorities and protected class.	Completed	
Gaming Commission	Other	MGC had a "Diversity and Inclusion" spotlight on its intranet page. This was typically used to share whatever OA-OEO was promoting for the month.	No	Resolved. Section was removed for the intranet site.	Completed	
Gaming Commission	Practice	Placemat Initiative stated: "Create a more productive and creative workforce by increasing diversity."	No	Resolved. Removed "by increasing diversity" from the the statement.	Completed	
State Emergency Management Agency	Training	The Federal Emergency Management Agency (FEMA) placed a stop work order on the Community Assistance Program-State Support Services Element (CAP-SSSE) Program to remove the following terms from activity descriptions: Disadvantaged, Marginalized, Underserved, Low-Income, Environmental Justice, Climate, Equity, Inclusion, Diversity, Minority, Affirmative Action, Accessibility, Culture, Federal Flood Risk Management Standard (FFRMS) and Justice40. After receiving the stop work order from FEMA on February 18, 2025, SEMA's Floodplain Management Section evaluated all National Flood Insurance Program (NFIP) training PowerPoints and removed all those terms from its trainings, appx. 692 Missouri communities participate in the NLIP Program.	No	Resolved. This did not result in any programmatic changes. The terms Risk Rating 2.0 - "Equity in Action" and "equitable" were removed for the 2025 Tools of Floodplain Management training workshop PowerPoint presentation. The problem is not with the new flood insurance rating methodology, just the verbiage.	Completed	

Department of Health and Senior Services Response

Joseph Williams

Joseph Williams, MHA, BSN, RN, FAANP

Director

State Department of Health and Senior Services

Missouri Department of Health and Senior Services

2000 Missouri State Capitol Building, Jefferson, MO 64603



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

DEI Executive Order

DHSS Implementation of EO 25-18

The Missouri Department of Health and Senior Services has completed our department-wide review of policies, procedures, practices, activities, training, program and contracts to ensure compliance with Governor Kehoe's Executive Order 25-18.

Our actions guarantee DHSS is adhering to the four directives:

1. Equal Protection of All People
2. Elimination of Public Funds for DEI
3. Prohibition on Considering DEI in State Hiring Decisions
4. Compliance Review

We have reviewed:

- 6,200 online PDFs
- 180+ internal and external webpages
- 100+ internal policies
- Nearly 100 chapters of regulations
- Currently posted position descriptions, training, contract and grant language

Key Changes:

- DHSS Strategic Plan updated to remove language: "Include diversity and inclusion in all practices, program and services."
 - Wall Artwork
 - Placemat
 - Printed Materials
 - Digital Materials
- Removed one PDF from Health.Mo.Gov that included "Diversity, Equity and Inclusion."
- Cleanup language for nine internal policies, two trainings and five regulations. Though the department did not have any policies, trainings, or regulations that it would consider DEI initiatives, this cleanup was done to avoid any appearance of potential non-compliance with the Executive Order and *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, 600 U.S. 181, 206, 230 (2023).
 - Due to the length of time it takes to complete rule revisions, this work will begin prior to the May 19 deadline and remain in progress until complete. The large majority of rule revisions are being done to remove the term "Affirmative Action" related requirements.

The department is required by Section XIV of the Missouri Constitution to appoint a chief equity officer to facilitate cannabis microbusiness licenses. Further, section 192.083, RSMo established an office of minority health to monitor and address health disparities. No action was taken in either of these areas.

Future iterations of the DHSS budget book will comply with the terms of the executive order. We have communicated this mandate department-wide and will provide continued education to ensure the executive order will be adhered to moving forward.

Respectfully submitted,

Sarah Willson, MBA, BSN, RN, FACHE
Director

Missouri Department of Health and Senior Services

State Agency Response to EO 25-18						
Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)	
Other	DHSS Strategic Plan Priority: "Include diversity and inclusion in all practices, programs and services."	No	The DHSS Strategic Plan and all related documents have been updated to remove this priority area.	Immediate action was taken.	The priority was removed from wall signage, as well as all digital and printed materials. It was also canceled as a priority within the department's performance management system and will be removed from FY27 proposed budget documents.	
Position	Chief Equity Officer within the Division of Cannabis Regulation	No	None - this position is required by Article XIV of the Missouri Constitution.	N/A	N/A	
Program	Office of Minority Health	No	None - this Office is required by state law (RSMo. 192.083).	N/A	N/A	
Position	Senior Public Health Program Specialist/Health Equity Program Specialist within the Office of Minority Health	No	None - the term "Health Equity" was deemed acceptable by the Governor's Office.	N/A	When referencing health outcomes, the term "Health Equity" is acceptable because the emphasis is on outcomes, not race, color, ethnicity, gender identity, or sexual orientation.	
Activity	Diversity and Inclusion Workgroup	No	Inactive webpages removed.	Webpages removed in early May.	This group has been inactive for a few years; however, their webpages were still on our Intranet server. Although they were not discoverable by link or search, they have been removed from the server entirely.	
Policy	Nine (9) department-wide policies	No	Policy language revised to remove language suggestive of diversity, equity, or inclusion preferences. Cleanup also focused on removal of affirmative action related requirements.	Immediate action was taken.	Policy language related to health equity was left in place because, as noted above, when referencing health outcomes, the term "Health Equity" is acceptable because the emphasis is on outcomes, not race, color, ethnicity, gender identity, or sexual orientation.	

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)	
Other	Five (5) regulations	No	Five regulations with references to affirmative action requirements or limitations on service delivery.	Three regulations can begin the rescission or amendment processes by the end of the month, but two others are part of larger rulemaking packages that the department anticipates filing in late summer or early fall. If those packages are delayed, these changes will be prioritized.	N/A	
	*while the department doesn't consider these activities to truly be DEI initiatives, these are typically the most notable in the eyes of stakeholders and the public.					

Department of Social Services Response



Missouri Department of Social Services

221 W High Street, Jefferson City, MO 65101 • Phone: 573-751-4815 • Fax: 573-751-3203
www.dss.mo.gov • TDD/TTY: 800-735-2966 Relay Missouri: 711



Mike Kehoe
Governor

August 20, 2025

The Honorable Mike Moon
Chairman, Select Committee on Equal Protection and DEI
State Capitol Office 220
Jefferson City, MO 65101

Dear Senator Moon,

In response to your request, I am submitting the enclosed documentation outlining compliance with Governor Kehoe's Executive Order 25-18 which directed all state departments receiving state funds to review their policies, training programs, and expenditures to ensure they do not treat individuals differently based on race, sex, or other protected characteristics.

The Department of Social Services is committed to transparency and to fully upholding the principles of equal protection under the law. The materials provided include summaries of areas reviewed, whether it is tied to a federal requirement, actions taken, and timelines, and reflect our ongoing efforts to ensure we are in alignment with the Executive Order.

We appreciate the opportunity to provide this information and are happy to answer any questions or supply additional documentation upon request.

Sincerely,

Jessica Bax
Director, Missouri Department of Social Services

Category	Initiative / Area Reviewed	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Other	Website scan for DEI terminology	No	Full department website scan, and DEI terminology changes and deletions made. Edits made in collaboration with DSS programmatic Division and OA/ITSD.	5/9/25	Detailed excel document available upon request.
Position	Division of Youth Services (DYS) Treatment Beliefs and Philosophies	No	Wording change to omit 'Diversity' and replace with 'Opportunity for all'. This was changed on the website and several Division of Youth Services trainings.	5/16/25	
Training	Prison Rape Elimination Act (PREA) DYS trainings	Yes	Training reviewed and changes made where appropriate while maintaining compliance with federal requirements.	4/17/2025	Notified on 4/28 the federal Department of Justice has ended its contract with the PREA Resource Center which will impact our ability to access their trainings in the future.
Practice	DYS Safety Building Blocks/Five Domains of Wellbeing (FFI)	No	Terminology reviewed and updated.	5/16/2025	
Training	Children's Division MO C.A.R.E Training Curriculum (Foster Parent Training)	Yes	Awaiting Federal guidance		Expected to be completed by October 1.
Program	SkillUp Provider Handbook	No	Wording change to replace 'inclusion of all ...' to 'opportunity for all'	4/10/2025	
Policy	Children's Division Child Welfare Manual	No	Updates made to eliminate DEI terminology	5/1/2025	
Hiring Practice	MO Careers/Job Notices	No	Removed "We celebrate diversity and are committed to creating an inclusive environment for all employees." from DSS job posting templates on MO Careers.	5/1/2025	
Hiring Practice	Exit Survey	No	Removed the following question from our exit surveys: "I believe DSS is dedicated to diversity and inclusion."	5/1/2025	
Training	Civil Rights and Diversity Training	No	Title changed to 'Civil Rights' along with scanning the training for DEI terms/initiatives and updating as appropriate.	5/1/2025	

Category	Initiative / Area Reviewed	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Practice	Workforce Diversity Advisory Group	No	Group is no longer active.	5/1/2025	
Other	Workforce Diversity Plan	No	Coordination with Office of Administration to address.	5/1/2025	
Activity	DSS Belonging Council	No	A central focus of this workgroup of DSS team members was creating a positive work environment. Department leadership coordinated transition of workgroup to fully focus on this (i.e. office safety, communication, opportunities for leadership experience and/or mentoring, etc.)	5/1/2025	
Training	DSS Children's Division Training	No	Terminology reviewed and updated.	5/30/2025	

Department of Economic Development Response

Luke Schrandt

From: Hataway, Michelle <Michelle.Hataway@ded.mo.gov>
Sent: Tuesday, July 29, 2025 5:39 PM
To: Mike Moon
Cc: Stauffer, Ryan; Luke Schrandt
Subject: DED's Response to Information Request from Select Committee on Equal Protection and DEI

Senator Moon,

This response covers the Department of Economic Development, its divisions, and the following boards or commissions: Missouri Tourism Commission, Missouri Military Preparedness & Enhancement Commission, Missouri Women's Council, Missouri Community Service Commission, Missouri Technology Corporation, and the Missouri Development Finance Board (together, for the purposes of this email "DED"). While this response is not for the Missouri Housing Development Commission the request has been forwarded to them. They will respond on their own.

As of the date of Executive Order 25-18 and thereafter, based on the definitions in E.O. 25-18, DED has no diversity, equity, and inclusion policies, procedures, practices, trainings, contracts, positions, organizational structures, programs, activities, or hiring practices. There are no changes to be made by DED to come into compliance with E.O. 25-18.

If there are any questions for DED, please let me know.

Thank you,



Missouri Department of
Economic Development

Michelle Hataway

Director

Missouri Department of Economic Development



O: 573-751-9051
C: 573-694-7158



P.O. Box 1157
Jefferson City, MO 65102

Department of Mental Health Response

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Other	Nothing Specific	No	Website updates	Completed February 2025	removed DEI language and links to outside entities
Position	Chief Equity & Inclusion Officer	No	Position vacated 3/1/23 and not re-filled;	Position vacant since 2023	Position was a best practice/suggestion not a requirement; Position is being reclassified as a program manager to oversee employee retention efforts
Position	Diversity, Equity & Inclusion Specialist	No	Position Reclassified	Completed December 2024	HR Position focused on employee retention and engagement
Position	Diversity, Equity & Inclusion Specialist	No	Job duties changed	Completed January 2025	HR Position focused on employee retention and engagement
Organizational Structure	Mental Health Equity & Inclusion Alliance Team	No	Disbanded	Completed March 2025	Team was a best practice/suggestion not a requirement; Department & community volunteers
Policy	Revised DMH policies	Yes	Updated language to remove DEI references	Completed March 2025	
Program	Psychology Internship Program	Yes	Updated language to remove DEI references	Completed April 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations.
Organizational Structure	Cultural Competence Committees	Yes	Updated language to remove DEI references	Completed May 2025	Joint Commission requirements regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations. Committees will remain active.
Policy	Diversity, Equity & Inclusion Policy Statements	No	Removed Policy statements in facility policy manuals	Completed March 2025	Statements were a best practice/suggestion not a requirement
Training	Diversity for All Employees for Healthcare--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Will replace with revised 650-C Diversity & Fair Employment Practices	Discontinued May 2025	Federal requirement/best practice regarding comprehensive training on discrimination, harassment, and employment law 15 min virtual training
Training	650-C Diversity & Fair Employment Practices--virtual training requirement	Yes	Currently still using, will revise existing training. Revisions in progress.	Revision Completed May 2025	Federal requirement/best practice regarding comprehensive training on discrimination, harassment, and employment law Approx 10 minute virtual training

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Training	Diversity & Disability--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Federal requirement/best practice regarding how to provide appropriate and respectful care for individuals with IDD 30 minute virtual training
Training	Diversity, Equity & Inclusion for the Healthcare Worker--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Federal requirement/best practice regarding how to provide appropriate and respectful care for individuals with IDD 60 minute virtual training
Training	Diversity, Inclusion, and Belonging--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Federal requirement/best practice regarding comprehensive training on discrimination, and harrasment 40 minute virtual training
Training	Implicit Bias in Healthcare--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Federal requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations. Presents the impact of implicit biases and other forms of discrimination in the provision of healthcare. Course objectives: 1. Define implicit bias 2. Describe the impact of historical discrimination on the provision of healthcare 3. Identify methods of evaluating the presence & extent of implicit bias 4. Describe measures to reduce implicit bias. 90 minute virtual training

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Training	Implicit Bias for the Healthcare Professional--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations. Presents the impact of implicit biases and other forms of discrimination in the provision of healthcare. Course objectives: 1. Define implicit bias 2. Describe the impact of historical discrimination on the provision of healthcare 3. Identify methods of evaluating the presence & extent of implicit bias 4. Describe measures to reduce implicit bias. 60 minute virtual training
Training	DEI: An Introduction to Multicultural Care--Virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations. 1. Identify 3 primary reasons why a commitment to DEI is critical for providing quality care and improving outcomes for individuals with behavioral health needs 2. Summarize ways you can identify and mitigate the impact of bias in your professional interactions. 3. Indicate at least 3 approaches you can use to demonstrate cultural humility and a commitment to diversity, equity, and inclusion. Be able to demonstrate culturally responsive care. 60 minute virtual training

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Training	DEI: Multicultural Care for the Organization--virtual training requirement	Yes	Currently still using, will discontinue by May 19. Looking for a suitable replacement	Discontinued May 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations. 1. Identify the primary gaps that exist within the current behavioral health landscape; 2. Indicate why culturally responsive and inclusive care is important for behavioral health organizations; 3. Recall at least 3 strategies organizations can use to be culturally responsive and inclusive. 60 min virtual training
Training	A Multicultural Approach to Recovery-Oriented Practice--virtual training requirement	Yes	Discontinue by May 19; looking for a suitable replacement	Discontinued May 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations.
Training	Sexual Orientation and Gender Identity--virtual training requirement	Yes	Discontinue by May 19; looking for a suitable replacement	Discontinued May 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations.
Training	Recognizing and Overcoming Unconscious Bias for Employees and Supervisors in the Healthcare Industry--virtual training requirement	Yes	Discontinue by May 19; looking for a suitable replacement	Discontinued May 2025	Joint Commission requirement/best practice regarding how to provide appropriate and respectful care for all individuals. Reduce incidents of patient rights violations.

Department of Commerce and Insurance Response



August 20, 2025

Senator Mike Moon
201 W. Capitol Ave., Rm. 220
Jefferson City, MO 65101
Mike.Moon@senate.mo.gov

RE: Request for documentation of compliance with Executive Order 25-18

Dear Senator Moon:

The Department of Commerce and Insurance takes seriously our Nation's and State's core values of freedom and equality, enshrined in the Constitutions of the United States and the State of Missouri. The Department upholds these core values and the constitutional principles of equal protection by treating all persons equally under the law, without regard to immutable characteristics like race or color.

Governor Kehoe issued Executive Order 25-18 on February 18, 2025, to guarantee fairness and equal protection in state government. To be sure, however, the Department did not wait for the Executive Order before taking action. As explained below and set forth in the attached spreadsheet, the Department took action to ensure compliance with the law.

Effective January 1, 2025, Commissioner of the Division of Finance Mick Campbell began his leadership as Acting Director of the Department. His priorities included identifying any diversity, equity, and inclusion (DEI) activities and taking appropriate action. His actions included the following:

- Acting Director Campbell conducted a comprehensive and thorough review to ensure that the Department was not supporting any DEI programs or initiatives.
- Acting Director Campbell ensured that no department staff traveled to or attended DEI conferences supported by state funds.
- Acting Director Campbell obtained accounting data from the Department's Accounting and Fiscal Management Section to ensure that no state funds were being spent on DEI. No budget reallocations were necessary.



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- Acting Director Campbell implemented a policy that no department employees would participate in DEI initiatives with the National Association of Insurance Commissioners (NAIC).
- Acting Director Campbell ensured that department personnel did not serve on any DEI committees at the NAIC.
- Acting Director Campbell deleted from the Department's Strategic Change Placemat that the Department would "[c]ontinue to support inclusion and diversity initiatives."
- Acting Director Campbell eliminated a requirement for new employees to watch a diversity training video entitled "Let's Talk About Implicit Bias," and later removed from its document management system the form by which employees would affirm compliance with this requirement.
- Under Acting Director Campbell's leadership, staff ensured that a federal grant administered by the Department for the Missouri State Health Insurance Assistance Program (SHIP) was being used to help all Missourians who qualified for help, specifically including those Missourians in rural and limited income areas, rather than limiting assistance to narrowly targeted groups.

Acting Director Campbell's work placed the Department on track for successful compliance with Executive Order 25-18 before the Executive Order was issued.

Department employees widely received notice of the issuance of Executive Order 25-18 through an email broadcast, thereby diminishing the need for any internal memorandum announcing the directive. In response to the Executive Order, Acting Director Campbell and department managers acted swiftly to ensure full compliance with the Executive Order, with the managers scheduling a meeting to discuss implementation the day after the Executive Order was issued.

Shortly after the Governor issued Executive Order 25-18 on February 18, 2025, Director Angela L. Nelson's leadership of the Department began on March 1, 2025. The Missouri Senate promptly confirmed Director Nelson's appointment on March 13, 2025.

Continuing the worthwhile efforts of Acting Director Campbell, Director Nelson has ensured full compliance with Executive Order 25-18, as follows:

- Director Nelson ensures the Department's rules, policies, employment practices, and actions continue to treat all citizens equally under the law.
- Director Nelson has ensured through direct communications with department management that all are aware of the prohibitions on DEI initiatives and other requirements of Executive Order 25-18. Summarized, these direct communications ensured that department management is aware of the prohibition on DEI initiatives, including participating in such initiatives through outside organizations.

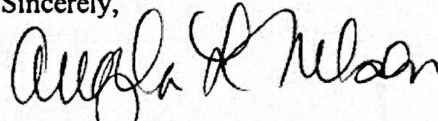
- Director Nelson was given the choice of whether to opt in to the NAIC's DEI-related initiatives. Director Nelson has notified NAIC leadership that she has not opted into any such participation and will not opt in to any participation by herself or any employees of the Department. Under Director Nelson's leadership, the Department is unequivocally not a participant in any DEI initiatives at the NAIC or any other organization. No Department employees have Director Nelson's authorization to participate in such initiatives.
- Director Nelson ensures that she and her employees do not participate in prohibited DEI practices, trainings, or activities in connection with their employment with the Department.
- Director Nelson ensures that the Department utilizes no state funds toward policies, procedures, practices, trainings, contracts, positions, organizational structures, programs, or activities that solely or primarily support DEI initiatives.
- Director Nelson's staff reviewed contracts for state services to the Department. None violates Executive Order 25-18.
- Director Nelson is the appointing authority for the Department's Divisions of Administration, Consumer Affairs, Company Regulation, and Market Regulation. The Director ensures hiring decisions are based on lawful considerations like merit, performance, skills, and qualifications—not DEI. Likewise, the leaders of the other department divisions—Director Sheila Solon of the Division of Professional Registration, Commissioner Mick Campbell of the Division of Finance, Chair Kayla Hahn of the Public Service Commission, Acting Director Emmett J. Bryson of the Division of Credit Unions, and Public Counsel Marc Poston of the Office of Public Counsel—do so as well. The Department features new employees and promoted employees in the Department's monthly CONNECT magazine.
- Under Director Nelson, staff scrutinized department policies and guidance to ensure that the policies did not deprive any person of equal protection of the law and did not include or promote DEI. For example, staff reviewed the following policies: Policy 2.102 on Equal Employment Opportunity, Policy 2.104 on Americans with Disabilities Act and Reasonable Accommodations, Policy 2.120 on Employee Standards of Conduct, Policy 2.202 on Disciplinary Actions, Policy 2.305 on the Family and Medical Leave Act, and Policy 2.320 on Reporting Discrimination and Other Employee Concerns Policy. As a result of this review, Director Nelson ensured the Department's policies comply with Executive Order 25-18.
- Under Director Nelson, staff also scrutinized new hire surveys and exit surveys of employees. No issues were found with respect to the new hire survey. The Department stopped using an exit survey that included questions regarding Diversity and Inclusion to ensure that no activities solely or primarily supported DEI.

- Under Director Nelson, the Department's rules were reviewed. No revisions were necessary to comply with Executive Order 25-18. The Department's rules are available at <https://www.sos.mo.gov/adrules/csr/current/20csr/20csr>.
- Under Director Nelson, the Department substituted language on its job announcements stating that it "celebrate[s] diversity and [is] committed to creating an inclusive environment for all employees" with merit-based language stating the Department "is committed to developing and maintaining a talented workforce."
- Director Nelson fosters employee engagement through State Employee Appreciation Month activities, quarterly Employee of the Quarter events, and monthly issues of CONNECT, not through any affinity groups that limit inclusion to shared identities.
- Director Nelson has no position or organizational structure at the Department that supports DEI initiatives in violation of the Executive Order.

"Our Constitution is color-blind, and neither knows nor tolerates classes among citizens." *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181, 230 (2023). As the above explanation and attached spreadsheet show, the Department is committed to the fair treatment and equal opportunity for all citizens and the customers the government serves.

I believe you and other legislators share this same commitment. The Department values your perspectives and looks forward to working with you to ensure equal treatment for all Missourians.

Sincerely,



Angela L. Nelson
Director

DCI Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines
Policy	Language on DCI's Strategic Change Placemat stating the Department would "[c]ontinue to support inclusion and diversity initiatives"	No	Acting Director Mick Campbell deleted this language from the Strategic Change Placemat.	Change implemented by Acting Director Mick Campbell after his tenure began in January 2025, before EO 25-18
Policy	Attendance at conference focusing on DEI	No	Acting Director Campbell ensured that no department staff traveled to or attended DEI conferences supported by state funds	Change implemented by Acting Director Mick Campbell after his tenure began in January 2025, before EO 25-18
Policy	DEI committees, programs, or other initiatives of NAIC	No	Acting Director Campbell ensured that no department staff would participate in DEI initiatives or serve on DEI committees at the NAIC.	Change implemented by Acting Director Mick Campbell after his tenure began in January 2025, before EO 25-18
Training	Requirement to watch implicit bias video and affirm compliance	No	Acting Director Campbell eliminated a requirement for new employees to watch a diversity training video entitled "Let's Talk About Implicit Bias," and later removed from its document management system the form by which employees would affirm compliance with this requirement.	Change implemented by Acting Director Mick Campbell after his tenure began in January 2025, before EO 25-18
Contract	Ensured grant did not target only certain groups	No	Under Acting Director Campbell's leadership, staff ensured that a federal grant administered by the Department for the Missouri State Health Insurance Assistance Program (SHIP) was being used to help all Missourians who qualified for help, specifically including those Missourians in rural and limited income areas, rather than limiting assistance to narrowly targeted groups.	Change implemented by staff under Acting Director Mick Campbell after his tenure began in January 2025, before EO 25-18
Activity	Prohibit participating in outside organizations' DEI-related initiatives	No	Director Nelson was given the choice of whether to opt in to the NAIC's DEI-related initiatives. Director Nelson has notified NAIC leadership that she has not opted into any such participation and will not opt in to any participation by herself or any employees of the Department. Under Director Nelson's leadership, the Department is unequivocally not a participant in any DEI initiatives at the NAIC or any other organization. No Department employees have Director Nelson's authorization to participate in such initiatives	Decision made by Director Nelson after her tenure began on March 1, 2025
Activity	Prohibit participating in outside organizations' DEI practices, trainings, or activities		Director Nelson ensures that she and her staff do not participate in any prohibited DEI practices, trainings, or activities of outside organizations.	Decision made by Director Nelson after her tenure began on March 1, 2025
Practice	Exit survey asking about diversity and inclusion	No	The Department stopped using an exit survey for employees that included questions regarding Diversity and Inclusion.	Decision made by Director Nelson after her tenure began on March 1, 2025

Department of Labor & Industrial Relations Response

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines
Policy	Workforce Diversity Policy Statement (Jan 2018)	No	Discontinued	Complete
Other	Leadership Academy DEI Capstone content/references/best practices placed on DOLIR Intranet pages for staff.	No	Removed references	Complete
Policy	Administrative Policy - EEO - Workforce Diversity Plan (B07-22300)	No	Made obsolete	Complete
Hiring Practice	DEI statement placed on all DOLIR job postings by OA	No	Notified OA	Complete
Training	D&I and Implicit Bias training provided by Missouri Commission on Human Rights	No	Removed training	Complete
Activity	Inclusion & Diversity Council	No	Disbanded Sept 2024	Complete

Department of Agriculture Response

State Agency Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Estimated Cost Savings from Response
Activity	Served as a member on the American Association of Veterinary Laboratory Diagnosticians DEI committee	No	No longer serving on the committee	Effective 4/28/25	\$0

Office Of Administration Response

Office of Administration's Response to EO 25-18

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
Hiring Practice	MoCareers' previous equal opportunity statement included DEI language.	Yes	Updated equal opportunity employer statement on MoCareers to remove references to diversity and inclusion.	Completed.	Date of Update: Approved by Legal on 3/6/25.
Training	1 CSR 20-6.010(2)(A)(3) states that management training must include the following: "Diversity. The practice of creating and maintaining a workplace culture that values trust, respect, and inclusion of all employees".	No	OA-Legal was already planning to update this chapter of the CSR to remove references to the Personnel Advisory Board. This subparagraph will be updated to say "Civility. The practice of creating and maintaining a workplace culture that values trust, respect, and a welcoming work environment for all employees".	3-6 months.	
Hiring Practice	Div. of Personnel maintains a website with Interview Tools which includes language about selecting a "diverse interview panel". This language is being removed from the website.	No	Language was removed.	Completed.	
Other	Office of Equal Opportunity's website include multiple references to diversity and inclusion programs and resources.	No	Language was removed.	Completed.	Note: references to the MBE/WBE/SDVE were not removed consistent with the EO Section 37.020
Other	Office of Equal Opportunity maintains an Accessibility Guide which includes DEI references.	No	Language is being removed.	1 month.	
Other	Div. of Personnel maintains a website with an Interview Question Generator which includes the question "How do you challenge stereotypes and promote sensitivity and inclusion in the workplace?"	No	Language was removed.	Completed.	
Other	Div. of Personnel maintains a website with an Interview Question Generator which includes the question "Collaborating in a diverse environment is sometimes challenging. Describe a time when you had to break down communication barriers and promote an environment where information was shared and expressed openly and honestly to enable teamwork within and across teams."	No	Word "diverse" was replaced with "team".	Completed.	
Program	Our Quarterly Pulse Surveys include a "Diversity" Outcome.	No	This program is being evaluated for changes - the word diversity will be removed from the final product.	Jan. 2026 (surveys are paused in the interim).	
Program	Speaker Series Evaluation	No	All trainings including content prohibited by the EO were removed before the 2025 Framework was published. Speakers are being vetted for unapproved content.	On-going.	
Program	LinkedIn Learning does have some DEI related content.	No	OA's Pathways were reviewed to confirm there was no DEI content. A disclaimer on the MO Learning website states as follows: MO Learning/LinkedIn Learning is a content library, and not all content is created by the State of Missouri. The State of Missouri does not endorse or support any specific views, opinions, or recommendations presented in LinkedIn Learning content that was not created by the State".	Completed.	

Category of DEI Initiative (select from list)	Brief Summary of DEI Initiative	Is the Initiative Tied to a Federal Requirement/ Suggestion? (whether in whole or part)	Action Taken	Timelines	Other Notes (if any)
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Program	Professional Leadership Development Award - OA administers this program which allows agencies to pay for team members to attend development training.	No	OA is preparing a FAQ which will instruct team members that they are not allowed to use these funds to participate in trainings using PLDA funds which "solely or primarily support diversity, equity, and inclusion".	On-going.	
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Program	OA's Workforce Diversity Plan	No	These plans were previously required by an executive order that was rescinded by the Parson administration. Section 36.040, RSMo still requires the DOP Director to consult with the State Equal Employment Opportunity Officer to develop plans to establish a state workforce which reflects the diversity of Missouri citizens at all levels of employment. OA discontinued its use of the diversity plans and is evaluating plans to capture Chapter 36 requirements while also carrying forward the goals of the EO.	On-going.	
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Missouri Housing Development Commission Response

CONTRACTOR SERVICES POLICIES

Request for Proposals Bidding Policy

Adopted 8/28/2009

The following contractual services are formally bid and selected by the board of Commissioners through a Request for Proposal (RFP) process:

- Bond Counsel
- Bond Trustee
- Commercial Banking
- Financial Advisors
- Independent Auditors
- Master Servicer
- Underwriter Team

For the selection of Independent Auditors, the Audit Committee is involved in the RFP process and the recommendation that is made to the Board of Commissioners.

The RFP process is conducted periodically as outlined in each request for proposal, such as every 3 to 5 years. In the case of the Bond Trustee, trustee and paying agent services are bid in conjunction with the onset of each trustee indenture.

Purchasing Policy

Adopted 8/28/2009 and Revised 6/4/2025

MHDC uses a competitive bidding or negotiation process for the purchase of products and services as detailed in this policy.

Purchase Requisitions

A Purchase Requisition is the internal tool used to identify and authorize the purchase of items or services. Purchase Requisitions may be submitted for any transaction, but must be submitted for any purchase transaction that exceeds \$3,000 unless exempted from this policy.

The requester of a Purchase Requisition should be the person who requires the goods or services or who has been assigned responsibility for the area of business operation in connection with the purchase. The requestor's signature must appear on the Purchase Requisition and must be in accordance with the requestor's grant of signature authorization. All purchases exceeding \$3,000 but less than \$25,000 must be signed by at least two employees with appropriate signature authorization. All purchases exceeding \$5,000 must be approved by the Executive Director or the Executive Director's specific designee. Unless specifically exempted as detailed in subsequent sections of this policy, purchases equal to or greater than \$25,000 must go through a formal bidding process as outlined in the "Formal Competitive Bid" section of this policy.

A properly completed Purchase Requisition will include, at a minimum, the following information:

1. Name of requestor;

2. Current date;
3. Quantity and description of the item(s) or service(s) to be purchased;
4. Unit pricing and extended pricing, with supporting documentation showing at least three price comparisons;
5. Cost totals including extended pricing and shipping or delivery costs;
6. Date needed (delivery date for purchase of products or dates of service for purchase of services);
7. Delivery address and contact information if other than requestor;
8. Authorized signature(s);
9. Competitive price quotations for purchases exceeding \$3,000 but are less than \$25,000 or justification for the absence of bids as allowed in this policy.

Purchase requisitions should be completed prior to completing the purchase transaction except in cases of emergency. Any Purchase Requisition completed after entering into the purchase transaction must be supported by detailed explanation of the emergency situation to prohibit the submission of the requisition on a timely basis.

All purchases of goods or services exceeding \$3,000 must be supported by three competitive price quotations except under certain circumstances as detailed under the "Competitive Price Quotations" section of this policy. MHDC may use the informal competitive bid procedure described in this section for purchases of more than \$3,000 but not more than \$25,000, in lieu of the procedures described in the "Formal Competitive Bid Procedure." Identical information shall be provided to potential suppliers with sufficient detail to allow for the collection of competitive pricing quotations for identical or comparable products or services. All competitive price quotations obtained from suppliers must be in writing. The use of the supplier's published prices may be used, including prices published in catalogs or on websites. In the event a supplier fails or refuses to submit a written competitive price quotation, the requestor should document the details of contact with the supplier including the name of the supplier, the date(s) of the contact, the name of the individual contacted when possible, and a summary of any information received in connection with the process.

Competitive price quotations are considered confidential information and employees of MHDC are prohibited from disclosing the contents of a specific supplier's competitive price quotations to another supplier during the purchasing process but such information may be made public, upon request, after the selection process is complete.

Certain purchases are specifically excluded from this competitive bid policy including professional services such as those purchased from attorneys, accountants, financial advisors, bond counsel, bond trustees, commercial banking services, independent auditors, master servicers and underwriters, sole source acquisitions, acquisitions through other governmental contracts, emergency purchases, and purchases of proprietary goods and services.

Competitive Price Quotations

For purchases requiring competitive price quotations, three competitive quotations should be obtained unless impossible or impractical for one of the following reasons:

1. **Standardization.** The business value of standardized products in connection with the purchase outweighs the business value of obtaining competitive price quotations.

2. Recent Competitive Price Quotations. Competitive price quotations from a previous purchase transaction may be used for comparable purchase provided that the Competitive Price Quotations received in connection with the prior purchase or not more than 18 months old.
3. Prior Supplier Performance. The business value of continuing an established business relationship with a supplier of goods or services based on the supplier's past experience, quality, price and service outweighs the business value of obtaining competitive price quotations. The requirement for obtaining competitive price quotations may be waived for a period not to exceed three years in connection with the prior supplier performance.
4. Contractual Obligation. The requirement for competitive price quotations may be waived in order to allow compliance with an existing contractual obligation. All purchasing policy requirement should be observed when entering into new contractual obligations.
5. Insufficient Lead Time. Insufficient lead time occurs when less than three suppliers are able to supply competitive price quotations and/or deliver the product or service by the required delivery date.
6. Other Extraordinary Circumstances. A statement signed by the Executive Director stating that the requirement for competitive price quotations is waived due to extraordinary circumstances may be substituted.

Formal Competitive Bid Procedure

When the estimated cost of needed goods and services exceeds \$25,000, the purchase or lease of the supplies, materials, equipment or services shall be purchased under formal written contract with the bidder providing the best products and services that are available for the lowest and best price. Notice inviting bids for the goods and services shall be provided in the manner and utilizing such medias as determined to be appropriate by the Executive Director or his/her designee in order to encourage fair and unbiased competition. The notice shall be designed to secure a reasonable distribution and a competitive bidding process and may include direct mail, electronic mail, online listing services, newspaper advertisements, and/or such other means as the Executive Director or his/her designee deems appropriate. The notice inviting competitive bids shall be distributed and/or posted at least five business days preceding the last date for receipt of bids or proposals and shall include a general description of the products or services to be leased or purchased. Said notice shall also state where bid forms and specifications may be obtained and the time and place for submission of bids. The Executive Director or his/her designee shall evaluate the bids submitted and make the determination based on this selection process below.

Selection of Supplier

The final supplier selection will be in the discretion of MHDC personnel and should be based upon selecting the lowest and best product or service. Selecting a supplier with the lowest price is only required when the bids are identical with regard to product and service including but not limited to availability, delivery or shipping services, diversity of selection, size, quantity, quality and brand name. Selection of the supplier with the lowest-priced bid is not required when a better product or service or a combination of product and service is available from another supplier.

MHDC is committed to supporting small business enterprises, including socially or economically disadvantaged enterprises such as disadvantaged, women-owned, minority-owned, and Section 3-certified business enterprises in its purchasing programs.

MHDC has established a goal for small business enterprise participation of 15% of the dollar volume of purchasing (excluding purchasing from sole supplier providers where there is no discretion in supplier selection and where there are no small business enterprise suppliers available).

Although individual purchases, projects or wards may not reach these goals, MHDC's intent is to work for the achievement of these goals over a fiscal year. Success depends on active commitment. MHDC's procurement activities should be as inclusive as possible in order to allow small business enterprises the maximum practicable opportunity to participate in providing goods and services to MHDC, including attempts to make reasonable accommodations to enable participation such as breaking an order into smaller portions.

MHDC is committed to encouraging small business enterprise suppliers to compete for business. It is MHDC's policy to seek and recruit small business enterprises for inclusion on a vendor list. The names, addresses, phone numbers, web information, and product or service type, if available, will be identified on the vendor list. MHDC will attempt to obtain a price quotation or bid from at least one small business enterprise supplier on the vendor list for purchases when possible.

The degree of utilization of small business enterprises should be considered along with the other selection factors including, but not limited to, the following:

1. Cost and future maintenance costs
2. Ability to perform
3. Timely performance
4. Character and reputation
5. Quality of prior performance
6. Compliance with laws
7. Quality and availability
8. Conditions on bid
9. Compliance with bid specifications
10. Environmental preference
11. Social responsibility, including encouraging diversity through use of women-owned and minority-owned enterprises, Section 3-certified business enterprises, and the payment of fair wages
- 12-10. Local (Missouri) preference

Conflict of Interest

A conflict of interest situation may exist when personnel are in a position to influence the direction or decision of purchases pursuant to this policy in such a way that may lead to the personal financial gain of the individual or of his/her immediate family or other designee. Any conflict of interest, actual or potential, must be fully disclosed in writing by the requestor and attached to the Purchase Requisition. In addition, the Purchase Requisition will require an additional signature of a disinterested party with equal or greater signatory authority.

Personal Purchases

MHDC personnel shall not commingle personal purchases with MHDC transactions.

PERSONNEL POLICIES

Employees

Adopted 8/28/2009, modified 10/05/2018

The Missouri Housing Development Commission employs individuals to fulfill its mission of providing affordable housing throughout the state of Missouri.

MHDC funds all employee salaries and related benefit expenses. MHDC employees are not on the state payroll system. MHDC manages its own payroll system and remits benefit related expenses directly to benefit providers.

MHDC complies with all federal, state and local regulations concerning employment. MHDC makes independent employment decisions within the framework of applicable law.

MHDC will develop specific policies pertaining to various personnel issues and such policies will be appropriately communicated to employees. Such policies will, from time to time, be modified or removed as necessary for the efficient administration business.

Whistleblower

Adopted 8/28/2009

The "Whistleblower" law (RSMo §105.055) prohibits supervisors or managers from preventing employees from discussing operations of MHDC with the legislature or with the State Auditor. In addition, this policy strictly prohibits supervisors or managers from preventing employees from discussing operations of MHDC with a member of the MHDC Audit Committee or any MHDC Commissioner. Any employee who, in good faith, discloses information relating to prohibited activities such as violations of regulations or the law, mismanagement, gross waste of funds, abuse of authority, or substantial and specific dangers to public health and safety will not be subject to disciplinary action. Retaliation against any individual for disclosing information to an MHDC Commissioner, the MHDC Audit Committee, the legislature or the State Auditor is strictly prohibited and any individual perpetrating such retaliation is subject to disciplinary action up to and including termination of employment.

The law and this policy do not authorize employees to represent their opinions as opinions of MHDC nor does it permit employees to leave during work hours without following normal procedures. An employee may be subject to disciplinary action if he/she knows the information disclosed to be false or if disclosure relates to some violation of his/her own, such as mismanagement, gross waste of funds, abuse of authority or endangerment of the public health or safety. This law does not allow employees to disclose information that is closed or confidential by law.

Grievances

Adopted 8/28/2009, modified 10/5/2018

The state of Missouri and MHDC have a grievance procedure to help employees resolve disagreements surrounding work relationships, working conditions and employment practices. Employees are

encouraged to work with supervisors in resolving disputes; however, the Human Resources Director and/or Director of Operations and/or the Executive Director are available to assist in settling disputes through a professional, but informal, conflict resolution process. The purpose of this policy is to establish a procedure for addressing these disagreements in a manner that does not adversely affect productivity.

A grievance is defined as any dispute over employment matters in which the appointing authority has complete or partial jurisdiction. To protest acts of harassment or unlawful discrimination employees should refer to the complaint procedure.

The grievance procedure should resolve grievances quickly; it should settle disagreements at the level of the employee and supervisor; and it should correct the cause of the grievance to prevent similar complaints. Employees must follow these steps when submitting a grievance:

Step 1 – Employees should attempt to resolve the dispute informally by verbally discussing the grievance with his/her immediate supervisor or manager. The employee may request that a representative of Human Resources be present to assist in addressing the dispute informally if desired.

Step 2 – In the event the grievance is not resolved during Step 1, the employee may submit a written grievance to the employee's Director within 30 working days of the incident. The written grievance must include a statement of the facts surrounding the complaint, a listing of any applicable witnesses or evidence, and specific remedies sought. The Director will respond to the grievance in writing within 10 working days of receiving the written grievance and will simultaneously provide a copy of the written grievance and response to Human Resources.

Step 3 – In the event the grievance is not resolved during Step 1 or Step 2, the employee may request review by Human Resources. The employee must submit his/her written request for review to Human Resources within 10 working days of receiving a response pursuant to Step 2 together with a copy of the employee's written grievance and any supporting documents submitted during Step 2. The Director will review all documentation and may request to meet with any of the parties involved and will provide a final response within 10 working days.

Time limits are intended to ensure prompt attention to all grievances. Calculation of time frames begins the next working day after the event or receipt of the involved documentation. Any of the time limits specified in the procedure may be extended by mutual agreement of the involved parties.

Grievances should not become a part of any other permanent record, and will not be maintained in the employee's personnel file. Grievances will be maintained separately in the Human Resources office. Supervisors maintaining copies of grievances should do so in a separate file.

Confidentiality is expected of all parties who are actual participants in the grievance proceeding.

Retaliation and/or coercion as a result of using the grievance procedure is strictly prohibited and any individual perpetrating such retaliation is subject to disciplinary action up to and including termination of employment.

Complaint

Adopted 8/28/2009

1. Employees must report all acts that violate the anti-harassment policy in writing to one of the following persons:
 - a. The employee's supervisor
 - b. The employee's manager
 - c. The Director of Human Resources
 - d. A member of management
 - e. General Counsel
 - f. The Executive Director
2. Supervisors, Managers and Directors are required to report all known, suspected or reported incidents of harassment or discrimination to the Director of Human Resources. In the event the complaint involves the Director of Human Resources, the complaint must be reported to the Executive Director. Failure of any supervisor, manager or Director to report any known, suspected or reported incidents of harassment or discrimination will result in disciplinary action up to and including termination.
3. Upon receipt of a written complaint, the Director of Human Resources, or his/her appointee, will quickly and discreetly conduct a thorough and impartial investigation of the complaint.
4. The complainant will be informed when the investigation is concluded.
5. In the event the investigation results in a finding of wrongdoing, appropriate corrective action will be taken.
6. Retaliation against Individuals filing a discrimination or sexual harassment complaint or participating in the investigation of a complaint is strictly prohibited and any individual perpetrating such retaliation is subject to disciplinary action up to and including termination of employment.

To the extent possible, all investigations will be conducted in a manner protecting the confidential nature of the complaint. Employees who may be involved in the investigation as witnesses or who may be asked to submit information for the fact-finding purposes are prohibited from disclosing the details of such participation in the investigation to any person.

Equal Employment Opportunity

Adopted 8/28/2009

The Missouri Housing Development Commission is committed to equal and fair employment practices and advancement opportunities to all employees and applicants without discrimination. MHDC provides equal employment opportunities, where employment is based upon each person's performance, abilities and qualifications without regard to race, color, religion, gender, age, national origin, physical or mental disabilities, veteran status or any other characteristic protected by applicable improperly governing law.

MHDC complies with all applicable requirements of Executive Order 94-03 as administered by the Department of Economic Development on its behalf. The Department of Economic Development prepares an Affirmative Action Implementation Plan in connection with Executive Order 94-03 on behalf of MHDC.

MHDC complies with all workforce eligibility laws, rules and regulations including the appropriate verification of employment eligibility of newly hired employees.

If any incident of discrimination in violation of this policy is observed, it is the responsibility of the employee to immediately report the incident to Human Resources. Retaliation against any party for reporting any incident, actual or suspected, is strictly prohibited. A representative of MHDC Human Resources will address any violation of this policy by conducting an appropriate investigation and providing appropriate corrective action as needed.

Americans with Disabilities Act

Adopted 8/28/2009

In accordance with the requirements of the Americans with Disabilities Act of 1990, MHDC will not discriminate against individuals with disabilities on the basis of disability in employment, services, programs, or activities.

MHDC will abide by all applicable federal and state laws, regulations, rules, and guidelines regarding the provision of reasonable accommodations required to afford equal employment opportunity to qualified disabled individuals. Such reasonable accommodations will be provided in a timely and cost-effective manner. Employment opportunities shall not be denied because of the need to make reasonable accommodations to an individual's disability.

Reasonable Accommodation is defined as an effort on the part of the employer to accommodate an individual's disability by making adjustments to the application process, the job, or the work environment which will enable that individual to interview for or perform the essential functions of the job, but which does not involve undue hardship to the employer.

Individual with a Disability is one who: has a physical or mental impairment which substantially limits a major life activity or the capacity to work; has a record of such impairment; or is perceived or regarded as having such impairment.

Qualified Individual with a Disability is one whose experience, education and/or training enable the person, with or without reasonable accommodation, to perform the essential functions of the job.

Undue Hardship refers to any accommodation that would be unduly costly, extensive, substantial or disruptive or that would fundamentally alter the nature or operation of the business.

Essential Functions are those job duties which are primary or intrinsic to a given position. They do not include those duties which are marginal or incidental to the position. Employees that require a reasonable accommodation to perform the essential functions of the job due to a disability should contact Human Resources.

Family Medical Leave Act

Adopted 8/28/2009

MHDC provides unpaid Family and Medical Leave (FMLA) to eligible employees who need to take time off from work duties to meet family obligations that are directly related to childbirth, adoption, or placement of a foster child. Family and Medical Leave may also be requested to care for a child, spouse,

or parent with a serious health condition. This also includes taking leave for one's own serious health condition.

In accordance with the Federal Family and Medical Leave Act of 1993, eligible employees are entitled to a maximum of 12 workweeks of FMLA during a rolling 12-month period of time that is calculated using the Lookback Method. Eligible employees are those who: have 12 months of cumulative service and have worked a minimum of 1,250 hours during the prior 12 months; have a qualifying reason for taking FMLA; and have a remaining balance of FMLA entitlement.

For any FMLA absence, an eligible employee will be required to use any available paid leave time concurrent with the start of the leave. All paid leave time shall be exhausted before an employee is eligible for unpaid leave.

Certification Requirements

- Leave due to a serious health condition shall require a written certification from a physician and must be supplied by the employee no later than 15 calendar days following a request.
- Leave to care for a child, spouse, or parent with a serious health condition shall require a written certification and a description of the care with an estimated length of time that the employee needs to care for the family member.

Employees may be required to recertify, by submitting additional physician certification, at the request of MHDC.

Anti-Harassment

Adopted 8/28/2009

MHDC is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment, whether by employees, guests, or vendors. MHDC will not tolerate any actions, words, jokes, or comments based on a person's gender, race, color, national origin, age, religion, disability, or any other legally protected characteristic.

Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This includes many forms of offensive behavior, including gender-based harassment of a person of the same gender as the harasser. The following is a partial list of examples of sexual harassment:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters.
- Verbal conduct that includes making or using derogatory comments, epithets, slurs or jokes.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations.

- Physical conduct that includes touching, assaulting, or impeding or blocking movement.
- Unwanted sexual advances (either physical or verbal), requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual behavior when:
 - Submission to such conduct is made either explicitly or implicitly a term or condition of employment
 - Submission or rejection of the conduct is used as a basis for making employment decisions; or
 - The conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile or offensive work environment.

If an employee experiences or witnesses sexual or other unlawful harassment in the workplace, the employee must follow the complaint procedure.

**Department of
Higher
Education and
Workforce
Development
Response**



DEPARTMENT OF HIGHER EDUCATION & WORKFORCE DEVELOPMENT

August 18, 2025

The Honorable Mike Moon
Chair, Select Committee on Equal Protection and DEI
201 West Capitol Avenue
Room 220
Jefferson City MO 65101

Dear Senator Moon:

The Department of Higher Education and Workforce Development is committed to empowering every Missourian with the skills and education needed for success and shares your commitment to equal protection. Prior to the issuance of Executive Order 28-18, the department began reviewing and revising its equity-focused activities. After the issuance of the order, the department undertook an in-depth comprehensive review, which you will find summarized in the attached documents.

In addition to the summary, this packet contains the list of contracts flagged for potentially being inconsistent with the Executive Order. Also, enclosed are the statutes setting out a scholarship program for minority and underrepresented students, which is meant to show the department is required by law to implement the program. Lists of items reviewed in our offices of Academic Affairs and our Economic Research and Information Center are also provided. Finally, the department's newly revised 2025 Strategic Plan, which is described in the summary, has been provided.

We hope these materials are helpful to you in your review of the department's efforts to comply with the requirements of the Executive Order. If you need additional information, please do not hesitate to contact Leah Strid, the department's Director of External Relations at 573-751-6561 or Leah.Strid@dhewd.mo.gov.

Sincerely,

Bennett G. Boggs, PhD.
Commissioner

To ensure compliance with Executive Order 25-18, the General Counsel's Office oversaw a comprehensive review, during which senior leadership worked within their respective divisions to diligently assess all existing policies, procedures, practices, trainings, contracts, positions, organizational structures, programs, and activities to determine whether any fell under the order's purview. At the beginning, employees cast a wide net, capturing any item that referenced diversity, equity, inclusion, race, color, ethnicity, affirmative action, gender identity, sexual orientation, and other key words listed in the Executive Order. While multiple items were initially identified, upon further review, it was determined no action was necessary because the items were outdated, purely informational, or authorized by law. The following summary provides details about the department's searches and findings.

Contracts

The department's procurement specialists reviewed all agreements, contracts, and bidding documents for any DEI-related language per the order and made a list of items they thought may be affected. For instance, some flagged contracts referenced programs for women and minorities. It turned out the identified language was directly quoted from appropriations language.¹ Other contracts were from prior fiscal years and one reference was located in a draft bid document that had not been distributed or used to enter a contract.

Financial Aid

The Financial Aid Office found references to affirmative action in a policy manual for the Minority and Underrepresented Environmental Literacy Program, which is established by statute in Section 173.240, RSMo. Per statute, college and university affirmative action officers appoint members of the committee that selects students to receive the scholarships. No action has been taken on the scholarship because it is required by law, and the legislature continues to appropriate funds to it.

Demographic Reports

The Office of Performance and Strategy reviewed every link and report on the MERIC website, Trendsights newsletter archive, and the Research and Data section of the department's website for any demographic data related to race/ethnicity, age, or gender.

Similarly, the Office of Financial Aid also has demographic breakdowns of aid recipients in its State Financial Aid Report, which includes categories like race/ethnicity. The

¹For example, Section 3.135 of SS/SCS/HCS/HB 2003 (2024) contains appropriations for pre-apprenticeship programs to assist minorities and women.

MoSCORES website contains the demographic breakdowns for age, gender, and race/ethnicity. Reports flagged for capturing demographic information were determined to be purely informational, and not subject to the order.

Items discontinued before the Executive Order

The department disbanded an internal Diversity Equity Inclusion and Belonging Committee led by Human Resources in November 2023. Since that time, the department has not engaged in any DEI trainings or programs for employees. Also, in November 2023, the department hosted its final "Equity in Higher Education" summit, with a focus on supporting students in rural communities in Missouri. Efforts to continue this annual conference were discontinued, with no scheduled conference in 2024 or 2025. References to the conference remain on the website to provide archives of past events.

Similarly, ahead of the Executive Order, the department's strategic plan was updated to eliminate and revise equity-focused language and measures. The department also expanded its scope to include rural Missourians and veterans in its demographic data used to measure growth in educational attainment and workforce participation.

In addition, the department received a grant in 2024 from the ECMC Foundation to launch a campaign targeting adult learners in four major metropolitan areas identified within the state (St. Louis, Kansas City, Springfield, Columbia). The original terms of the grant set by ECMC emphasized advertising to men of color in these areas specifically. Prior to the Executive Order, the department began conversations about how to best move forward with this grant and broaden the target audience while meeting objectives to serve adult learners. Before any contracts were entered, activities undertaken, or grant funds spent, the department met with ECMC and the scope of the grant was expanded to include all adult learners in the identified areas. The draft bid document referred to under the contracts section was related to this project. As previously mentioned, that draft was not used when the contract was eventually awarded.

Finally, the department performed an extensive search of information, initiatives, and material on its website that may be related to equity or DEI. Items identified by the department were archived to clearly show that these efforts have discontinued.

In summary, after conducting an extensive search within the agency, the department did not find any existing policies, procedures, practices, trainings, contracts, positions, organizational structures, programs, or activities inconsistent with Executive Order 25-18. The department remains committed to working for all Missourians in providing opportunities to success equally.

Department Elementary and Secondary Education Response

August 22, 2025
Senator Mike Moon
201 W. Capitol Ave., RM 220
Jefferson City, MO 65101

Dear Senate Select Committee on Equal Protection and DEI,

Missouri Executive Order (EO) 25-18, issued on February 18, 2025, requires that (1) state agencies comply with the principals of equal protection in rules, policies, and employment practices; and (2) no state funds be used by state agencies toward diversity, equity, and inclusion practices, as defined by the EO. The EO also requires state agencies conduct a review to ensure compliance with the directives provided.

The Missouri Department of Elementary and Secondary Education (DESE) has completed a comprehensive review of its policies, procedures, practices, trainings, contracts, positions, organizational structures, programs, and activities (agency activities) as required by EO. Based on this review, DESE has not identified any agency activities that are in violation of federal or state civil rights laws, including EO 25-18.

To provide additional clarity about the work of the department in response to this EO, DESE has begun the process of modifying some terminology in its policies, contracts, grant applications and guidance, and other areas and activities. These modifications are intended to avoid any implication or appearance of noncompliance with state and federal civil rights laws, the *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, 600 U.S. 181 (2023) case, and this EO.

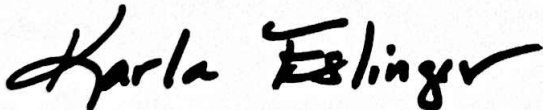
Should DESE receive any staff, client, vendor, or public complaints that raise concerns about DESE's compliance with these provisions, DESE has processes in place to quickly review and take appropriate action.

Specifically, DESE has taken the following steps:

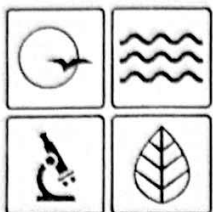
- DESE made the following changes prior to the Governor's EO:
 - Updated its gifted programs regulation (5 CSR 20-110.110) and Gifted Education Program Guidelines to remove references to race or ethnicity. The language was approved by the Missouri Attorney General's Office.
 - Eliminated the DESE Diversity, Equity, and Inclusion workgroup, which had been providing training opportunities to staff on working with clients and co-workers with disabilities
 - Amended its non-discrimination policy to ensure it was in compliance with the federal EOs issued in January
 - Removed training on diversity from DESE's annual training requirement
- DESE did the following in response to the Governor's EO:
 - Surveyed the department for any areas of non-compliance
 - Reviewed contracts, MOUs, guidance documents, and other materials to ensure the language used is appropriate and legally correct. In some cases, updates to language have been made to avoid confusion of intent
 - Is undertaking a full review of its website, which includes removal of outdated documents
- When DESE receives complaints or concerns from the public:
 - Immediately determine if the concern is with DESE materials or with a district or charter school
 - We review and quickly remove any outdated materials as part of our ongoing website review effort
 - If the complaint is about a district or charter school, review and determine next steps, which may include requesting DESE staff to contact the school and/or for more information

If you have additional questions, please do not hesitate to reach out to me.

Sincerely,



Dr. Karla Eslinger
Commissioner of Education



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

May 19, 2025

Jordan Roling
Deputy General Counsel
Office of the Governor
State Capitol, Room 216
P.O. Box 720
Jefferson City, MO 65102
Via Email: Jordan.Roling@governor.mo.gov

Dear Jordan:

On February 18, 2025, Governor Kehoe's Executive Order 25-18 (the Order), directing Executive Agencies to comply with the principle of equal protection in the United States and Missouri Constitutions. The Order directed that no state funds could be used in a discriminatory manner, as defined in the Order. The Executive agencies were further directed to review and take appropriate action on any existing policies, procedures, practices, trainings, contracts, positions, organizational structures, programs, or activities within the agency to ensure compliance with the principle of equal treatment under the law.

In compliance with this directive, the Missouri Department of Natural Resources (MoDNR) has conducted such a review. After diligent evaluation of MoDNR's own operations as applied to the definitions of within the Order, including diversity, equity, and inclusion (DEI), we have determined that no agency operations or actions meet that definition, either in letter or in practice. As a result, MoDNR has no changes to make to be compliant with the Order.

If you have any questions, please let me know at your earliest convenience. I can be reached by phone at (573) 751-0323, or by email at jacob.westen@dnr.mo.gov. Thank you.

Sincerely,

Jacob Westen
General Counsel

JTW:tcs

